

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIE CLARIDGE and HELEN MARSH,

Plaintiffs,

v.

NORTH AMERICAN POWER & GAS, LLC,

Defendant.

Case No: 15-cv-1261-PKC

DECLARATION OF
PETER G. SIACHOS, ESQ.
IN OPPOSITION TO PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION

PETER G. SIACHOS hereby declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of Gordon & Rees, LLP, counsel for Defendant North American Power & Gas, LLC (“NAPG”) in the above-captioned matter.
2. I submit this Declaration in opposition to the motion for class certification of Plaintiffs Julie Claridge (“Claridge”) and Helen Marsh (“Marsh”).
3. A copy of pertinent portions of the transcript of the deposition of Claridge dated May 5, 2016 is annexed hereto as **Exhibit A**.
4. A copy of pertinent portions of the transcript of the deposition of Marsh dated May 6, 2016 is annexed hereto as **Exhibit B**.
5. A copy of pertinent portions of the transcript of telephone conversations between Marsh and NAPG is annexed hereto as **Exhibit C**.
6. A copy of pertinent portions of the transcript of telephone conversations between Claridge and NAPG is annexed hereto as **Exhibit D**.
7. A copy of a refund check issued by NAPG to the order of Marsh is annexed hereto as **Exhibit E**.

8. Declarations of several current NAPG customers are collectively annexed hereto as **Exhibit F**.

9. A copy of the transcript of the Deposition of William Kinneary dated April 7, 2016 is annexed hereto as **Exhibit G**.

10. Copies of sales agreements between Claridge and NAPG are collectively attached hereto as **Exhibit H**.

11. A copy of the sales agreement between Marsh and NAPG is attached hereto as **Exhibit I**.

12. A copy of the renewal notice sent by NAPG to Claridge is attached hereto as **Exhibit J**.

13. Copies of invoices sent by NAPG to Claridge in connection with electricity services provided to her home are annexed hereto as **Exhibit K**.

14. A copy of the renewal notice sent by NAPG to Marsh is attached hereto as **Exhibit L**.

15. A copy of internal sales guidelines used by NAPG's customer service representatives during the relevant time period are attached hereto as **Exhibit M**.

16. Copies of invoices sent by NAPG to Marsh in connection with electricity services provided to her home are annexed hereto as **Exhibit N**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted,

/s/Peter G. Siachos

PETER G. SIACHOS

Dated: May 13, 2016